

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KENNETH SCOTT, SR.,

[DOB: 8/20/68]

MALCOLM DESEAN REDMON,

a/k/a Malcolm Deshawn Redmon; Malcolm Redmond; "Harp"

[DOB: 2/21/83]

GUILLERMO ORTIZ PEREZ,

a/k/a "Youngster," Jorge Alinso Ortiz [DOB: 5/16/90]

MARLON DION JORDAN,

a/k/a "Miles," "Mal"

[DOB: 11/23/79]

RODNEY WAYNE ARNOLD,

a/k/a Rodney O.

[DOB: 2/8/84]

CARL DOUGLAS SIMON,

a/k/a Nuvan Brown; Antonio Hopkins; Carl Douglass Simon; "Lil Carl"

[DOB: 8/5/87]

RONALD ELWOOD BROWN,

[DOB: 9/16/75]

RONNIE LEE GILLETTE,

a/k/a Larry Gillette; Ronney Keyes; Rickey Green; Ronney Reyes; "Blue"

[DOB: 12/31/60]

MICHAEL EARL HUNT, JR.,

a/k/a Mike Deuce

[DOB: 3/15/81]

DION ANTONIO VAUGHN,

[DOB: 8/14/76]

TEKA LYNN HAYES,

a/k/a Julea Hayes; Peteka Hayes; Tina Hayes; Chuck Nickname

[DOB: 9/11/64]

MARCUS DION JORDAN,

a/k/a James Stephens; Bird Jordan;

No. 14-04065-01/27-CR-C-BP

Count 1: (All Defendants except Goins)
21 U.S.C. §§ 846 and 841(a)(1)

NLT 5 years; NMT 40 years
and/or \$5 million fine

Supervised Release: NLT 4 years
Class B Felony

Counts 2-3: (Count 2 Hayes/Redmon; Count 3
Marcus Jordan/Redmon)

21 U.S.C. § 856(a)(2)

NMT 20 years and/or \$500,000

Supervised Release: NMT 3 years
Class C Felony

Counts 4-5: (Count 4 Scott, Sr.; Count 5
Marcus Jordan)

18 U.S.C. § 922(g)(1)

NMT 10 years and/or \$250,000

Supervised Release: NMT 3 years
Class C Felony

Counts 6 - 34: (6, 30, 33/Redmon; 7-8, 11-13,
15 /Hopkins; 9-10/Marlon Jordan; 14, 17,
21/Hill; 16, 18, 20, 23-24/Dennis; 19/Brown &
Summers; 22/Simon; 25, 28-29, 31/Arnold;
26/Simon & Brown; 27/Summers; 32, 34
/Hunt)

21 U.S.C. § 841(a)(1)

NMT 20 years and/or \$1 million

Supervised Release: NLT 3 years
Class C Felony

Counts 35 -53: (35, 51/Redmon; 36-
37/Redmon & Thornton; 38/Gillette;
39/Dawson; 40, 42, 43/Scott Sr. & Vaughn;
41/Scott Sr. & Pittman; 44/Scott Sr. & Scott
Jr.; 45/Scott Sr. & Dawson; 46/Scott Sr. &
Jackson; 47, 48 /Wright & Redmon;
49/Redmon & Edwards & Hunt; 50/Redmon &
Smith; 52, 53/Redmon & Kee & Sledd)

Marcus Jordon; Marcos Stephens [DOB: 11/5/75]	21 U.S.C. § 843(b) NMT 4 years and /or \$250,000 Supervised Release: NMT 2 years Class E Felony
TYRONE DEWAYNE JACKSON, [DOB: 5/22/79]	
TRAVIS DEWAYNE DENNIS, a/k/a Tyrek Lamont Dennis, Ty Dennis, Thomas Hawkins, Tyree Dennis, "Boomer" [DOB: 11/18/82]	
DEVON CORTEZ HOPKINS, a/k/a "Boom Boom" [DOB: 3/16/86]	Count 54-55: (54 Redmon/Wright; 55 Redmon/Goins) 18 U.S.C. § 1952(a)(3) NMT 5 years and/or \$250,000 Supervised Release: NMT 3 years Class D Felony
PAYDROM LEE SUMMERS, a/k/a Carlos Earnest Allen; James Allen; A. Goldie; Taylor Jackson; Turon Jackson; Mike Summers; Pedro Summers [DOB: 4/16/75]	Count 56: (Redmon/Wright/Goins) 18 U.S.C. § 371 NMT 5 years and/or \$250,000 Supervised Release: NMT 3 years Class D Felony
GREGORY VINCENT DAWSON, [DOB: 4/23/76]	
WILLIAM ALEXANDER HILL, a/k/a William Demarco Hill, "BJ" [DOB: 9/20/85]	\$100 mandatory penalty assessment, each Count, each Defendant therein
COURTNEY LASHEA THORNTON, [DOB: 1/4/81]	
RYAN D. WRIGHT, a/k/a William Hireler; Ryan Dale Wright; Ryan David Wright; Hyler William; Red Wright; Rico Davis; William Hyler [DOB: 12/18/75]	
COURTNIE LEA GOINS, [DOB: 6/28/89]	
MARLON LARON SMITH, [DOB: 7/8/80]	
VERSHAWN DEJUAN EDWARDS, [DOB: 2/4/92]	
JAMES THOMAS PITTMAN, [DOB: 12/28/72]	
CHRISTIN SLEDD, [DOB: 7/28/90]	
RYAN MONTEZ KEE, [DOB: 12/23/86]	
KENNETH SCOTT, JR., [DOB: 1/6/89]	

Defendants.

DEFENDANT	COUNTS
Kenneth Scott, Sr.	1, 4, 40-46
Malcolm Desean Redmon	1, 2, 3, 6, 30, 33, 35-37, 47-56
Guillermo Ortiz Perez	1
Marlon Dion Jordan	1, 9, 10
Rodney Wayne Arnold	1, 25, 28, 29, 31
Carl Douglas Simon	1, 22, 26
Ronald Elwood Brown	1, 19, 26
Ronnie Lee Gillette	1, 38
Michael Earl Hunt, Jr.	1, 32, 34, 49
Dion Antonio Vaughn	1, 40, 42, 43
Teka Lynn Hayes	1, 2
Marcus Dion Jordan	1, 3, 5
Tyrone Dewayne Jackson	1, 46
Travis Dewayne Dennis	1, 16, 18, 20, 23, 24
Devon Cortez Hopkins	1, 7, 8, 11-13, 15
Paydrom Lee Summers	1, 19, 27
Gregory Vincent Dawson	1, 39, 45
William Alexander Hill	1, 14, 17, 21
Courtney Lashea Thornton	1, 36, 37
Ryan D. Wright	1, 47, 48, 54, 56
Courtnie Lea Goins	55, 56
Marlon Laron Smith	1, 50
Vershawn Dejuan Edwards	1, 49
James Thomas Pittman	1, 41
Christin Sledd	1, 52, 53
Ryan Montez Kee	1, 52, 53
Kenneth Scott, Jr.	1, 44

INDICTMENT

THE GRAND JURY CHARGES THAT:

Count 1

(Conspiracy to Distribute and Possess
with Intent to Distribute Controlled Substances)

From an unknown date, but at least as early as in or about November 2011, and continuing until on or about September 2014, in Boone County, in the Western District of Missouri, and elsewhere, KENNETH SCOTT, SR., MALCOLM DESEAN REDMON, GUILLERMO ORTIZ PEREZ, MARLON DION JORDAN, RODNEY WAYNE ARNOLD, CARL DOUGLAS SIMON, RONALD ELWOOD BROWN, RONNIE LEE GILLETTE, MICHAEL EARL HUNT, JR., DION ANTONIO VAUGHN, TEKA LYNN HAYES, MARCUS DION JORDAN, TYRONE DEWAYNE JACKSON, TRAVIS DEWAYNE DENNIS, DEVON CORTEZ HOPKINS, PAYDROM LEE SUMMERS, GREGORY VINCENT DAWSON, WILLIAM ALEXANDER HILL, COURTNEY LASHEA THORNTON, RYAN D. WRIGHT, MARLON LARON SMITH, VERSHAWN DEJUAN EDWARDS, JAMES THOMAS PITTMAN, CHRISTIN SLEDD, RYAN MONTEZ KEE, and KENNETH SCOTT, JR., defendants, did knowingly and intentionally combine, conspire, confederate and agree with each other, and others, known and unknown to the Grand Jury, to distribute and possess with the intent to distribute a controlled substance, including a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), all in violation of Title 21, United States Code, Section 846.

Quantity of Cocaine Base

As to KENNETH SCOTT, SR., MALCOLM DESEAN REDMON, GUILLERMO ORTIZ PEREZ, MARLON DION JORDAN, MARCUS DION JORDAN, and TEKA LYNN HAYES, their conduct as members of the conspiracy charged in Count 1 involves 280 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, punishable under Title 21, United States Code, Section 841(b)(1)(A)(iii).

As to CARL DOUGLAS SIMON, RODNEY WAYNE ARNOLD, RONALD ELWOOD BROWN, RONNIE LEE GILLETTE, GREGORY VINCENT DAWSON, DION ANTONIO VAUGHN, WILLIAM ALEXANDER HILL, TRAVIS DEWAYNE DENNIS, DEVON CORTEZ HOPKINS, PAYDROM LEE SUMMERS, MICHAEL EARL HUNT, JR., TYRONE DEWAYNE JACKSON, RYAN MONTEZ KEE, and RYAN D. WRIGHT, their conduct as members of the conspiracy charged in Count 1 involves 28 grams or more of a mixture and substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance, punishable under Title 21, United States Code, Section 841(b)(1)(B)(iii).

As to COURTNEY LASHEA THORNTON, KENNETH SCOTT JR., JAMES THOMAS PITTMAN, MARLON LARON SMITH, VERSHAWN DEJUAN EDWARDS, and CHRISTIN SLEDD, their conduct as a member of the conspiracy charged in Count 1 involves a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, punishable under Title 21, United States Code, Section 841(b)(1)(C).

Quantity of Cocaine

As to KENNETH SCOTT, SR., MALCOLM DESEAN REDMON, GUILLERMO ORTIZ PEREZ, MARLON DION JORDAN, TEKA LYNN HAYES, and DION ANTONIO

VAUGHN, their conduct as members of the conspiracy charged in Count 1 involves 5 or more kilograms of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, punishable under Title 21, United States Code, Section 841(b)(1)(A)(ii).

As to MARCUS DION JORDAN, RONALD ELWOOD BROWN, their conduct as a member of the conspiracy charged in Count 1 involves 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, punishable under Title 21, United States Code, Section 841(b)(1)(B)(ii).

As to all other defendants, their conduct as a member of the conspiracy charged in Count 1 involves a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, punishable under Title 21, United States Code, Section 841(b)(1)(C).

Count 2
(Maintaining Drug-Involved Premise)

On or about August 5, 2014, in Boone County, in the Western District of Missouri, TEKA LYNN HAYES and MALCOLM DESEAN REDMON, defendants, while managing and controlling a residence at 1318 Dawn Ridge Court, Columbia, Missouri, as an owner or lessee or occupant, knowingly and intentionally made available for use, with and without compensation, said residence for the purpose of unlawfully storing cocaine and cocaine base, Schedule II controlled substances, in violation of Title 21, United States Code, Section 856(a)(2).

Count 3
(Maintaining Drug-Involved Premise)

On or about August 5, 2014, in Boone County, in the Western District of Missouri, MARCUS DION JORDAN and MALCOLM DESEAN REDMON, defendants, while managing and controlling a residence at 408 Sanford, Columbia, Missouri, as an owner or lessee or

occupant, knowingly and intentionally made available for use, with and without compensation, said residence for the purpose of unlawfully storing cocaine and cocaine base, Schedule II controlled substances, in violation of Title 21, United States Code, Section 856(a)(2).

Count 4
(Felon in Possession of a Firearm)

1. On or about August 5, 2014, and earlier, in Columbia, in Boone County, in the Western District of Missouri, KENNETH SCOTT, SR., defendant, having been previously convicted of a crime punishable for a term exceeding one year, did knowingly possess in and affecting commerce a firearm, namely, a Smith & Wesson, model SW40VE, .40 caliber pistol, with a serial number that had been ground off; Kel-Tec, model P3AT, .380 caliber pistol, serial number H4H05, and a Phoenix Arms, model HP22A, .22 caliber pistol, serial number 4346887.
2. Prior to the possession alleged in ¶1, defendant had been convicted of at least one crime (felony), punishable for a term exceeding one year. Defendant was convicted as set forth below:

- a) On or about June 8, 1992, in the Circuit Court of Cole County, Jefferson City, Missouri, in case number CR192-0011F, defendant was convicted of two counts of felony Delivery of a Controlled Substance;
- b) On or about August 7, 1995, in the Circuit Court of Callaway County, Fulton, Missouri, in case number 13R0694000402-01, defendant was convicted of felony Drug Trafficking; and
- c) On or about October 16, 1998, in the Circuit Court of Moniteau County, California, Missouri, in case number 26089800407F, defendant was convicted of felony Possession of a Controlled Substance in a Correctional Facility;

All in violation of Title 18, United States Code, Sections 922(g)(1), and 924(a)(2).

Count 5
(Felon in Possession of a Firearm)

1. On or about August 5, 2014, and earlier, in Columbia, in Boone County, in the Western District of Missouri, MARCUS DION JORDAN, defendant, having been previously convicted of a crime punishable for a term exceeding one year, did knowingly possess in and affecting commerce a firearm, namely, Jennings Firearms, model J22, .22 caliber pistol, serial number 135431, and Phoenix Arms Company, model HP25A, .25 caliber pistol, serial number 4364162.
2. Prior to the possession alleged in ¶1, defendant had been convicted of at least one crime (felony), punishable for a term exceeding one year. Defendant was convicted as set forth below:
 - a) On or about October 24, 1994, in the Circuit Court of Boone County, Columbia, Missouri, in case number 13R019442521-01, defendant was convicted of felony Burglary;
 - b) On or about July 15, 2002, in the Circuit Court of Boone County, Columbia, Missouri, in case number 02CR166162-01, defendant was convicted of felony Drug Trafficking;
 - c) On or about June 13, 2005, in the Circuit Court of Boone County, Columbia, Missouri, in case number 05BACR0014701, defendant was convicted of felony Possession of a Controlled Substance and Drug Trafficking; and
 - d) On or about April 12, 2010, in the Circuit Court of Boone County, Columbia, Missouri, in case number 09BACR0433601; defendant was convicted of felony Possession of a Firearm.

All in violation of Title 18, United States Code, Sections 922(g)(1), and 924(a)(2).

Counts 6- 34

(Possession with Intent to Distribute/Distribution Cocaine/Crack Cocaine)

On or about the dates set forth below as to each count, in Boone County, in the Western District of Missouri, the defendant(s) set forth below as to each count, did knowingly and intentionally possess with intent to distribute and distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, or cocaine base, a Schedule II controlled substance, as made specific below, in violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT	DATE	CONTROLLED SUBSTANCE	DEFENDANT
6	11/29/11	Cocaine	Malcolm Redmon
7	8/23/13	Crack Cocaine	Devon Hopkins
8	9/25/13	Crack Cocaine	Devon Hopkins
9	10/2/13	Crack Cocaine	Marlon Jordan
10	10/15/13	Crack Cocaine	Marlon Jordan
11	10/18/13	Crack Cocaine	Devon Hopkins
12	11/7/13	Crack Cocaine	Devon Hopkins
13	11/15/13	Crack Cocaine	Devon Hopkins
14	11/22/13	Crack Cocaine	William Hill
15	11/25/13	Crack Cocaine	Devon Hopkins
16	1/8/14	Crack Cocaine	Travis Dennis
17	1/15/14	Crack Cocaine	William Hill
18	1/16/14	Crack Cocaine	Travis Dennis
19	2/19/14	Cocaine	Ronald Brown/Paydrom Summers
20	2/26/14	Crack Cocaine	Travis Dennis
21	3/19/14	Crack Cocaine	William Hill
22	3/26/14	Crack Cocaine	Carl Simon

23	4/10/14	Crack Cocaine	Travis Dennis
24	4/18/14	Crack Cocaine	Travis Dennis
25	4/18/14	Crack Cocaine	Rodney Arnold
26	5/1/14	Crack Cocaine	Carl Simon/Ronald Brown
27	5/2/14	Crack Cocaine	Paydrom Summers
28	6/4/14	Crack Cocaine	Rodney Arnold
29	6/6/14	Crack Cocaine	Rodney Arnold
30	6/22/14	Crack Cocaine	Malcolm Redmon
31	7/19/14	Crack Cocaine	Rodney Arnold
32	7/22/14	Cocaine	Michael Hunt
33	7/24/14	Cocaine	Malcolm Redmon
34	7/29/14	Cocaine	Michael Hunt

Counts 35 – 53

(Use of a Communications Facility
to Facilitate a Drug Trafficking Conspiracy)

On or about the dates set forth, in Boone County, in the Western District of Missouri, the defendants listed below as to each count, did knowingly and intentionally use a communications facility, that is, a telephone, to facilitate the commission of conspiracy to distribute and possess with the intent to distribute controlled substances, and possession with intent to distribute and distribute controlled substances, that is, a mixture and substance containing a detectable amount of cocaine base/crack, a Schedule II controlled substance, and/or a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 843(b).

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANT(S)</u>
35	11/29/2011	Malcom Redmon
36	11/4/2012	Malcom Redmon/Courtney Thornton
37	11/6/2012	Malcom Redmon/Courtney Thornton
38	5/24/2014	Ronnie Lee Gillette
39	5/28/2014	Gregory Dawson
40	5/20/2014	Kenneth Scott Sr. / Dion Vaughn
41	6/2/2014	Kenneth Scott Sr./James Pittman
42	6/3/2014	Kenneth Scott. Sr. / Dion Vaughn
43	6/4/2014	Kenneth Scott. Sr. / Dion Vaughn
44	6/13/2014	Kenneth Scott. Sr. / Kenneth Scott. Jr
45	6/16/2014	Kenneth Scott. Sr. /Gregory Dawson
46	7/9/2014	Kenneth Scott. Sr./Tyrone Jackson
47	7/11/14	Ryan D. Wright/Malcolm Redmon
48	7/12/14	Ryan D. Wright/Malcolm Redmon
49	7/14/2014	Malcolm Redmon/Vershawn Edwards/Michael Hunt
50	7/23/2014	Malcolm Redmon/Marlon Smith
51	7/26/2014	Malcolm Redmon
52	8/1/2014	Malcolm Redmon/Ryan Kee/ Christin Sledd
53	8/1/2014	Malcolm Redmon/Ryan Kee/Christin Sledd

Count 54

(Use of a Phone in Regards to Unlawful Activity)

On or about July 15, 2014, in the Western District of Missouri and elsewhere, MALCOLM DESEAN REDMON, and RYAN D. WRIGHT, defendants, used a facility in interstate commerce, namely a telephone, with the intent to promote, manage, establish, carry on

and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, prostitution offenses in violation of Missouri criminal law, 567.020, 567.030 and 567.070 RSMO , thereafter performed and attempted to perform an act to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of such unlawful activity, in violation of Title 18, United States Code, Section 1952(a)(3).

Count 55

(Use of a Phone in Regards to Unlawful Activity)

On or about July 16, 2014, in the Western District of Missouri and elsewhere, MALCOLM DESEAN REDMON, and COURTNIE LEA GOINS, defendants, used a facility in interstate commerce, namely a telephone, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, prostitution offenses in violation of Missouri criminal law, 567.020, 567.030 and 567.070 RSMO , thereafter performed and attempted to perform an act to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of such unlawful activity, in violation of Title 18, United States Code, Section 1952(a)(3).

Count 56

(Conspiracy to Use a Facility in Interstate Commerce
To Promote, Manage and Carry On Unlawful Activity)

From an unknown date, but at least as early as in or about June, 2014, and continuing until on or about August, 2014, in Boone County, in the Western District of Missouri, and elsewhere, MALCOLM DESEAN REDMON, RYAN D. WRIGHT and COURTNIE LEA GOINS, defendants, did knowingly combine, conspire and agree with each other and with other persons, known and unknown to the Grand Jury, to use a facility in interstate commerce with the intent to otherwise promote, manage, establish, carry on and facilitate the promotion,

management, establishment and carrying on any unlawful activity, namely, prostitution offenses in violation of Missouri criminal law, 567.020, 567.030 and 567.070 RSMO, and thereafter performed and attempted to perform: 1) an act to distribute the proceeds of such unlawful activity; or 2) to promote, manage and carry on or facilitate the promotion, management and carrying on of such unlawful activity, all in violation of Title 18, United States Code, Section 1952.

It was a part and an object of the conspiracy that MALCOLM DESEAN REDMON would and did establish a separate prostitution business, in addition to his business of the distribution of controlled substances, in order to diversify his unlawful efforts.

It was a part of the manner and means that RYAN D. WRIGHT would teach MALCOLM DESEAN REDMON how to conduct the prostitution business, and would assist him in several ways, including lending him the services of COURTNIE LEA GOINS. In return for his help, MALCOLM DESEAN REDMON would sell RYAN D. WRIGHT cocaine, and would teach him how to be successful in distributing illegal controlled substances.

It was a further part of the manner and means that MALCOLM DESEAN REDMON would supply COURTNIE LEA GOINS with a room from which to work as a prostitute, and that he would also provide her with protection, and cocaine, while she was working for him.

It was a part of the manner and means of the conspiracy that the conspirators would use telephones in order to communicate between themselves about the prostitution business, including, but not limited to assignments, payment, and customers. The phone was also used to attempt to recruit additional persons to serve as prostitutes.

Overt Acts

In furtherance of the conspiracy, the following overt acts, among others, were committed and caused to be committed:

- A. On or about July 15, WRIGHT explained the prostitution business to REDMON on the phone.
- B. On or about July 15, 2014 WRIGHT traveled to Columbia with GOINS, and another person.
- C. On or about July 15 2014 WRIGHT picked up cocaine and returned to Springfield, Missouri.
- D. On or about July 15, 2014, two rooms were rented at a motel in Columbia, Missouri.
- E. On or about July 16, 2014, GOINS asked REDMON about a customer.
- F. On or about July 16, 2014, REDMON sent a text telling GOINS how much time she had remaining with a customer.
- G. On or about July 16, 2014, REDMON provided cocaine to GOINS.
- H. On or about July 17, 2014, a REDMON made a call to try and recruit a woman to join his prostitution business.

All in violation of Title 18, United States Code, Section 371.

A TRUE BILL.

/s/

FOREPERSON OF THE GRAND JURY

/s/

ANTHONY P. GONZALEZ
Assistant United States Attorney
Missouri Bar No. 29922

Dated: 11/5/14